

1 COOLEY LLP
2 MICHAEL A. ATTANASIO (151529)
(mattanasio@cooley.com)
3 BENEDICT Y. HUR (224018)
(bhur@cooley.com)
4 SIMONA AGNOLUCCI (246943)
(sagnolucci@cooley.com)
5 EDUARDO E. SANTACANA (281668)
(esantacana@cooley.com)
6 ARGEMIRA FLÓREZ (331153)
(aflorez@cooley.com)
7 NAIARA TOKER (346145)
(ntoker@cooley.com)
8 HARRIS MATEEN (335593)
(hmateen@cooley.com)
9 THILINI CHANDRASEKERA (333672)
(tchandrasekera@cooley.com)
10 ISABELLA MCKINLEY CORBO (346226)
(icorbo@cooley.com)
11 CHELSEA HU (357212)
(chu@cooley.com)
12 3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
13 Telephone: (415) 693-2000
Facsimile: (415) 693-2222

14 Attorneys for Defendant
GOOGLE LLC

20 ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

Case No. 3:20-CV-04688-RS

**DECLARATION OF ARGEMIRA FLÓREZ IN
SUPPORT OF GOOGLE LLC'S MOTION IN
LIMINE NO. 16 TO EXCLUDE CERTAIN
PROPOSED DEMONSTRATIVES**

Dept: 3, 17th Fl.
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020
Trial Date: August 18, 2025

1 I, Argemira Flórez, hereby declare as follows:

2 1. I am an associate with the law firm Cooley LLP and am counsel for Defendant
 3 Google LLC in the above captioned action. I am duly licensed to practice law in the state of
 4 California and am admitted to practice before this Court. The matters set forth herein are of my
 5 own personal knowledge, and if called as a witness to testify, I could and would testify to these
 6 matters. I submit this declaration in support of Defendant's Motion in Limine No. 16 to Exclude
 7 Certain Proposed Demonstratives, filed concurrently herewith.

8 2. On July 29, 2025, the parties exchanged draft trial demonstratives. Plaintiffs' draft
 9 demonstratives included a presentation for Dr. Jonathan Hochman.

10 3. On Monday, August 18, 2025, Plaintiffs disclosed to Google a list of 32 exhibits, a
 11 deposition transcript, and 71 demonstrative slides that they seek to use during the examination of
 12 their technical expert, Dr. Jonathan Hochman. The slides shown in the Appendix to Motion in
 13 Limine No. 16 are from Dr. Hochman's demonstrative presentation disclosed to Google on August
 14 18, 2025.

15 4. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of the deposition
 16 transcript of Dr. Hochman, dated June 26, 2023.

17 5. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of Dr.
 18 Hochman's expert report, dated March 22, 2023.

19 6. Dr. Hochman has not previously disclosed an opinion on whether Google's
 20 disclosures were misleading.

21 I declare under penalty of perjury under the laws of the State of California and the United
 22 States of America that the forgoing is true and correct.

23 Executed on August 20, 2025, at San Francisco, California.

24
 25
 26 */s/ Argemira Flórez*
 27 Argemira Flórez
 28